

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

JENNIFER DOCHEE,)	
)	
Plaintiff,)	
)	
vs.)	
)	Cause No.
THE METHODIST HOSPITALS, INC.,)	
)	
Defendant.)	

NOTICE OF REMOVAL

The Defendant, Methodist Hospitals, Inc. ("Methodist"), by counsel and pursuant to 28 U.S.C. § § 1331, 1441 and 1446, hereby provide Notice of Removal of this administrative action to the United States District Court for the Northern District of Indiana. The grounds for removal are:

1. On October 28, 2020, Jennifer Dochee ("Dochee"), filed a Charge of Discrimination with the Gary Human Relations Commission (the "GHRC") and Equal Employment Opportunity Commission ("EEOC"). A true and accurate copy of the Charge of Discrimination is attached hereto as "**Exhibit A**" and is incorporated herein by reference.

2. Although the case was dual filed, the GHRC as a Fair Employment Practices Agency ("FEPA") for the EEOC, was tasked with investigating and administratively adjudicating the Charge of Discrimination.

3. Pursuant to Rule 13, Section 13.1, of the Rules and Regulations of the Gary Human Relations Commission, “[a]ny Party or Person aggrieved by a final order or determination made by the Commission shall be entitled to judicial review . . .”. A true and accurate copy of the Rule 13, Section 13.1 of the Rules and Regulations of the Gary Human Relations Commission is attached hereto as **“Exhibit B”** and incorporated herein by reference.

4. On May 10, 2021, the GHRC made a probable cause determination and the parties attempted conciliation. A true and accurate copy of the Probable Cause Determination is attached hereto as **“Exhibit C”** and incorporated herein by reference.

5. Following the Probable Cause Determination, the parties attempted to resolve the matter through the conciliation process, however, the parties were unable to settle the matter through the conciliation process.

6. This Court has original jurisdiction pursuant to 28 U.S.C. § 1331 because this matter involves a federal question in that Dochee alleges a violation of the Title VII of the Civil Rights Act of 1964, a federal law.

7. Contemporaneous with the filing of this Notice of Removal, Methodist will provide written notice to all attorneys of record and to the GHRC of the filing of this Notice of Removal.

8. Contemporaneous with the filing of this Notice of Removal, the Defendants have submitted the filing fee to the Clerk of the United States

District Court for the Northern District of Indiana in the amount of Four Hundred Two (\$402.00) Dollars.

WHEREFORE, Defendant, The Methodist Hospitals, Inc., respectfully requests that the above action now pending against it with the Gary Human Relations Commission, be removed to this Court.

Respectfully submitted,

By: /s/ Steven J. Scott

Steven J. Scott (#22763-45)
HODGES & DAVIS, P.C.
8700 Broadway
Merrillville, IN 46410
(219) 641-8700
Attorneys for Defendant,
The Methodist Hospitals, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Jennifer Witherspoon
witherspoonlegal@gmail.com

Haneefah Khaaliq
hkhaaliq@gary.gov

I also hereby certify that on the 3rd day of September, 2021, a copy of the Notice of Removal was served on the Plaintiff herein and the Gary Human Relations Commission by depositing the same in the United States Mail, first class postage prepaid, and addressed as follows:

Haneefah Khaaliq, Esq
Gary Human Relations Commission
455 Massachusetts
Gary, IN 46402
(219) 883-4151

Jennifer Dochee c/o
Jennifer Witherspoon
J. Witherspoon Legal & Mediation Services
32 N. West St. Suite 100
Waukegan, IL 60085
(847) 672-7819

/s/ Steven J. Scott

Steven J. Scott